

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF LOUISIANA

UNITED STATES OF AMERICA

\* CRIMINAL DOCKET NO. 10-025

v.

\* SECTION: “ J ”

KELLY A. THOMPSON

\* VIOLATION: 18 U.S.C. § 666(a)(1)(A)

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**FACTUAL BASIS**

If this matter were to proceed to trial, the Government would have introduced the following through competent evidence and testimony beyond a reasonable doubt:

The Government would introduce competent testimony and documentary evidence that Langston Hughes Academy was a Charter School organization located in New Orleans, Louisiana. Langston Hughes Academy was managed by NOLA 180. NOLA 180 was a Charter School Management Organization.

The Government would introduce competent testimony and documentary evidence that Langston Hughes Academy received in excess of \$10,000 from federal programs and grants within a one year period - including the period of time the defendant, KELLY A. THOMPSON, was employed at Langston Hughes Academy.

The Government would introduce competent testimony and documentary evidence that the defendant, KELLY A THOMPSON, was employed as the Business and Human Resources Manager/Financial Manager at Langston Hughes Academy Charter School beginning on or about July 1, 2008 and continuing until on or about November 6, 2009. That position at Langston Hughes Academy included being responsible for personnel, payroll, paying bills, applying for grants and handling the school's taxes.

The Government would introduce competent testimony and documentary evidence that beginning in as early as August 2008, the defendant began diverting monies belonging to Langston Hughes Academy bank accounts and converting those monies to her own use and personal benefit.

The Government would introduce competent testimony and documentary evidence to show that the defendant stole funds belonging to Langston Hughes Academy by various means including writing checks to herself without authorization; writing counter checks for cash for her personal benefit; or by making counter withdrawals from various bank accounts, in which all means without the school's authorization. Finally, in order to conceal her theft, the defendant would make false entries into the schools books and financial records by utilizing the school's computer system.

The Government would introduce competent testimony and documentary evidence to show that the defendant, KELLY A. THOMPSON, stole in excess of approximately \$660,000 of monies belonging to Langston Hughes Academy Charter School which covered the period of time from on or about August 2, 2008 to on or about November 2009.

The Government would introduce competent testimony to show that the defendant when interviewed by federal law enforcement agents admitted to the theft of monies belonging to the Langston Hughes Academy Charter School during the time period indicated in the Bill of

Information. The defendant advised that the money she stole from the Langston Hughes Academy Charter School bank accounts was used to support the defendant's gambling habit which occurred in various casinos in the New Orleans Metropolitan Area.

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KELLY A THOMPSON (Date)  
Defendant

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JAMES C. LAWRENCE, JR. (Date)  
Attorney for Defendant

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EDDIE J. JORDAN, JR. (Date)  
Attorney for Defendant

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JAMES R. MANN (Date)  
Assistant United States Attorney

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BRIAN M. KLEBBA (Date)  
Assistant United States Attorney

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SALVADOR PERRICONE (Date)  
Assistant United States Attorney